

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

MARY VERONICA SANTIAGO-MONTEVERDE,

Debtor.

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Case No. 11-15494 JMP

Chapter 7

**STIPULATION FURTHER EXTENDING THE CHAPTER 7 TRUSTEE'S TIME  
TO ASSUME OR REJECT THE ESTATE'S RIGHTS IN A CERTAIN LEASE**

JOHN S. PEREIRA (the "Trustee"), as Chapter 7 Trustee for the estate of MARY VERONICA SANTIAGO-MONTEVERDE, the debtor in the above-captioned case (the "Debtor"), and EAST 7<sup>th</sup> STREET DEVELOPMENT CORP., the landlord for the Premises (as defined below) (the "Landlord"), by their respective counsel, hereby stipulate as follows:

**WHEREAS**, on November 29, 2011 (the "Filing Date"), the Debtor filed a voluntary petition for relief pursuant to Chapter 7 of Title 11 of the United States Code (the "Bankruptcy Code"); and

**WHEREAS**, as of the Filing Date, the Debtor was a party to a rent stabilized lease (the "Lease") for an apartment located at 199 East 7<sup>th</sup> Street, Apt. 1A, New York, New York 10009 (the "Premises"); and

**WHEREAS**, the Trustee and the Landlord are presently attempting to finalize the terms of a sale of the estate's interest in the Lease and the Premises; and

**WHEREAS**, the Trustee's time to assume or reject the Lease was to expire on Monday, January 30, 2012; and

**WHEREAS**, pending the negotiations between the Trustee and the Landlord the parties agreed to extend the Trustee's time to assume or reject the Lease up to and including March 30, 2012, which stipulation was "So Ordered" by the Court; and

**WHEREAS**, the Debtor filed an amended schedule of exemptions claiming an exemption in the Lease, to which the Trustee has filed an objection, which is scheduled to be heard before the Court on March 29, 2012, the result of which will effect the rights of the parties to the Lease; and

**WHEREAS**, the Trustee and the Landlord are in the process of finalizing the terms of the sale of the Lease;

**IT IS HEREBY STIPULATED AND AGREED** that:

1. The Trustee's time to assume or reject the Lease is hereby further extended thirty days to Monday, April 30, 2012.

2. The Trustee's time to assume or reject the Lease may be further extended by written agreement between the Trustee and the Landlord and without further order of the Court.

3. The Bankruptcy Court shall have exclusive jurisdiction and venue regarding any dispute arising under or relating to this Stipulation.

4. This Stipulation shall be governed by the United States Bankruptcy Code and the internal laws of the State of New York, without regard to any conflict of law provision that could require the application of the law of any other jurisdiction.

5. By signing below, each signatory represents that he or

she is authorized to bind his or her respective client.

6. This Stipulation may be signed by facsimile and in counterpart originals with the same force and affect as if fully and simultaneously signed on a single original document.

Dated: March 16, 2012  
New York, New York

PEREIRA & SINISI, LLP  
Counsel for the Trustee

By: /s/ Ann Marie Sinisi  
ANN MARIE SINISI (as1112)  
The Chrysler Building  
405 Lexington Avenue  
7<sup>th</sup> Floor  
New York, New York 10174

Dated: March 15, 2012  
Scarsdale, New York

HASS & GOTTLIEB  
Counsel for the Landlord

By: /s/ Lawrence M. Gottlieb  
LAWRENCE M. GOTTLIEB  
670 White Plains Road  
Suite 12  
Scarsdale, New York 10583  
(914) 725-2600

IT IS SO ORDERED this

\_\_\_\_\_ day of March, 2012

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JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE